

Andrew Harding

From: Andrew Harding
Sent: Friday, November 22, 2024 11:54 AM
To: Justin Pearson; Dylan Moore
Cc: RICHARD H. MATTHEWS; Anne Lahren
Subject: RE: Parksley: joint motion proposal
Attachments: Defs 6th Supplemental Document Production 394-568.pdf

Justin,

Per our phone conversations earlier this week and today, attached are the communications between Parksley and Town Attorney André Wiggins between October 13, 2023, and November 21, 2023.

This production does not constitute a broader waiver of attorney-client privilege regarding the communications between Parksley and Wiggins. The waiver is limited only to the actual contents of these produced documents you've requested so you can evaluate your claims, and no further. In addition, we are not waiving objections to the use of these produced documents if this case goes to trial.

Regards,
Andy

Andrew Harding

ATTORNEY

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From: Justin Pearson <jpearson@ij.org>
Sent: Friday, November 22, 2024 9:01 AM
To: Andrew Harding <AHarding@PenderCoward.com>; Dylan Moore <dmoore@ij.org>; Paul Sherman <psherman@ij.org>
Cc: RICHARD H. MATTHEWS <RMATTHEW@PenderCoward.com>; Anne Lahren <alahren@PenderCoward.com>
Subject: RE: Parksley: joint motion proposal

External Email

Hi Andy. Yes, we should do a joint motion pushing the dates back. However, the length of the delay will depend in part on whether the two sides will need to brief our motion to compel regarding the communications with Mr. Higgins during the time period we discussed. Do you have an update on whether your clients are willing to provide those materials?

Justin

From: Andrew Harding <AHarding@PenderCoward.com>
Sent: Tuesday, November 19, 2024 12:37 PM
To: Justin Pearson <jpearson@ij.org>; Dylan Moore <dmoore@ij.org>; Paul Sherman <psherman@ij.org>

Cc: RICHARD H. MATTHEWS <RMATTHEW@PenderCoward.com>; Anne Lahren <alahren@PenderCoward.com>

Subject: Parksley: joint motion proposal

Justin,

Based on our conversation this morning, would Plaintiffs be agreeable to a joint motion asking the Court for additional time to complete discovery etc. via an amended scheduling order?

If yes, can you propose to us your preferred dates for the discovery cut off and dispositive motions (MSJ/Oppositions/Replies)? We can then adjust the proposed scheduling order accordingly from top to bottom.

Please advise.

Andy

Andrew Harding

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